IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
CARMEN RODRIGUEZ PUCHALES	*	CASE NO. 15-06546 MCF
Debtor(s)	*	CHAPTER 13
FIRST BANK PUERTO RICO	*	INDEX
Movant	*	
CARMEN RODRIGUEZ PUCHALES; JOSE RAMON CARRION MORALES,	*	
CHAPTER 13 TRUSTEE	*	
Respondent (s)	*	

DEBTOR'S RESPONSE TO *MOTION FOR RELIEF FROM AUTOMATIC STAY* DOCKET NO. 24

TO THE HONORABLE COURT:

NOW COMES, CARMEN RODRIGUEZ PUCHALES, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On May 13, 2016 Banco Popular de Puerto Rico ("BPPR") filed a motion requesting that stay be lifted in the present bankruptcy case, docket no. 24, basically alleging that the debtor is in arrears in the post-petition direct mortgage loan payments to said creditor in the sum of $2,346.17, including late charges, legal costs, fees and expenses in the present Index.

2. The debtor hereby admits to the aforementioned post-petition arrears and respectfully informs that she is in the process of obtaining the funds to cure the same.

3. The debtor respectfully requests additional time to obtain the funds to cure the post-petition arrears, as stated by BPPR in its 362 motion, docket entry no. 24. The debtor respectfully requests that she be granted thirty (30) days from the date of the preliminary hearing scheduled for June 07, 2016, in the above captioned Index. This extension of time to expire on July 07, 2016.

WHEREFORE, the debtor respectfully requests from this Honorable Court to grant the present response and grant debtor's request for an extension of time to obtain the funds to cure the aforestated post-petition arrears pursuant to BPPR's motion requesting relief from the automatic stay, docket entry #24, and inform this Honorable Court, accordingly, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; Jose A. Moreda Del Valle, Esq., *Parra Del Valle Limeres*, Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the debtor/respondent Carmen Rodriguez Puchales, PMB 12 100 Hernan Cortes Avenue Suite 5 Trujillo Alto PR 00976.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, 24th day of May, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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